



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

October 26, 2011

Mr. Michael J. Erickson
Associate Vice President/Principal Engineer
ARCADIS
10559 Citation Drive, Suite 100
Brighton, MI 48116

SR-6J

RE: Area 2 Proposed Soil and Sediment Field Sampling Plan

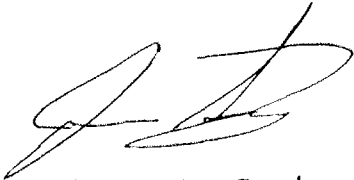
Dear Mr. Erickson:

The United States Environmental Protection Agency (EPA) has completed its review of the October 21, 2011, Proposed Soil and Sediment Field Sampling Plan for the Otsego City Impoundment (Area 2) for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. This is the second revision to the sampling plan and reflects the discussion of several conference calls between EPA, Michigan Department of Environmental Quality and Georgia-Pacific. The proposed sample locations are adequate to complete the initial round of sampling to determine the nature and extent of contamination in Area 2. Consistent with the Area 2 Supplemental Remedial Investigation work plan, EPA proposes that when the sample results are validated, the data is compiled in tabular and graphic form for EPA to review, and that we meet to discuss the results to determine what future sampling may be required in the spring of 2012 to complete the Area 2 Remedial Investigation.

Therefore, EPA approves the Area 2 Soil and Sediment Field Sampling Plan. EPA has enclosed a few general comments that must be addressed in this plan. A revised final document incorporating adequate responses to the enclosed comments must be submitted within (30) thirty days of receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. A. Saric', written in a cursive style.

James A. Saric
Remedial Project Manager
SFD Remedial Response Branch #1

Enclosure

cc: Paul Bucholtz, MDEQ
Gary Griffith, Georgia-Pacific
Richard Gay, Weyerhaeuser

Bcc w/enclosure:

Jeff Keiser, CH2MHILL
Leslie Kirby-Miles, ORC

**U.S.EPA COMMENTS
ON THE
AREA 2 SOIL AND SEDIMENT FIELD SAMPLING PLAN
ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SITE**

GENERAL COMMENTS

Commenting Organization: EPA
Section: NA **Page #: NA**
General Comment #: 1

Commenter: Saric
Lines #: NA

Unlike the floodplain and bank investigations, the instream investigation does not appear to build on the reconnaissance effort. The document should provide text and figures to relate the proposed sample locations to current and historic geomorphic features.

Commenting Organization: EPA
Section: NA **Page #: NA**
General Comment #: 2

Commenter: Saric
Lines #: NA

Please include the side-by-side scatter plots for all samples in addition to the ones for the samples with PCB >1 mg/kg. The reader cannot tell from these plots whether there are no samples in a particular sample group, or if there are samples in the group but none above 1 mg/kg.

Commenting Organization: EPA
Section: NA **Page #: NA**
General Comment #: 3

Commenter: Saric
Lines #: NA

The existing sample locations above the 700 foot boundary are not readily identifiable on the Figure 3 series. Please indicate the 700-foot boundary on the maps or modify the symbols to identify which locations are above the boundary.